

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

SCANSOFT, INC.,

V.

VOICE SIGNAL TECHNOLOGIES, INC.,  
LAURENCE S. GILLICK, ROBERT S.  
ROTH, JONATHAN P. YAMRON, and  
MANFRED G. GRABHERR,

Defendants.

C.A. No. 04-10353-PBS

## DECLARATION OF SARAH COLUMBIA

I, Sarah Columbia, on oath, depose and say as follows:

I am a partner in the law firm Choate, Hall & Stewart and am counsel of record for the defendants in this action. I make this declaration in connection with Voice Signal Technologies, Inc.'s Motion to Produce Documents Pursuant to Court Order Under Seal.

1. Attached hereto is a true and accurate transcription of a voice mail message left for me on April 15, 2005 by Lisa Fleming, one of the attorneys for ScanSoft in this action

Signed under the pains and penalties of perjury this 19<sup>th</sup> day of April, 2005.

/s/ Sarah Chapin Columbia  
Sarah Chapin Columbia

Voicemail Message left for Sarah Columbia by Lisa Fleming 04/15/05:

“Hi Sarah it’s Lisa Fleming calling from Bromberg Sunstein. I’m calling to follow up on a letter that we sent to Paul [Popeo] yesterday asking for the trade secret discovery that Judge Saris has ordered --so we had expected to get a response from you yesterday. Our letter asked for that along with documents. I am hoping that you can help out here and give me a call and let me know what your position is on this. We plan to move quickly because we want to get those documents as soon as we can and move forward with the individual depositions. So please get in touch with me 617-443-9292. I’d really appreciate. Thanks very much Sarah.”